

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
Plaintiff)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

MOTION TO QUASH

Now come the Defendants Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County and respectfully request that this Honorable Court quash a subpoena duces tecum issued by the Plaintiff to the Suffolk County District Attorney's Office (SCDAO) (a copy of which is attached as Exhibit A). The subpoena requests documents in the SCDAO personnel file for Andrea Cabral, Sheriff of Suffolk County. As reasons therefore the Defendants state that such documents are exempt from disclosure under the Public Records Law and not reasonably calculated to lead to the discovery of admissible evidence. The Defendants also refer to their attached Memorandum of Law.

Defendants Request A Hearing On Their Motion.

Respectfully submitted
Andrea Cabral, Suffolk County Sheriff's
Department, and Suffolk County
By their attorney,

/s/ Ellen M. Caulo
Ellen M. Caulo
BBO #545250

Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 989-6681

Date: June 16, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

Counsel for the Defendants hereby certifies pursuant to Local Rule 7.1 that she has conferred with Anita Bapooji, Esq., counsel for the Plaintiff, in an effort to resolve the issues raised by the instant motion.

/s/Ellen M. Caulo
Ellen M. Caulo